

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

ERICK RODERICO PIVARAL	§	
GONZALEZ, Individually and as Special	§	
Administrator of the Estate of NEHEMIAS	§	
R. PIVARAL SANTOS, DECEASED,	§	Civil Action No. 3:22-CV-02714-K
ERICK SANTOS and EVELYN MORENO	§	
	§	
	§	
Plaintiffs	§	
	§	
v.	§	
	§	
CAYLEE ERIN SMITH &	§	
EASTMAN CHEMICAL COMPANY	§	
	§	
Defendants.	§	
	§	

**PLAINTIFFS' OPPOSITION TO DEFENDANTS'**  
**MOTION FOR PARTIAL SUMMARY JUDGMENT**

Pursuant to Local Rules 7.1 and 56.4, Plaintiffs Erick Roderico Pivaral Gonzalez, Erick Santos, and Evelyn Moreno (collectively “Plaintiffs”) file this Opposition to Defendants’ Motion for Partial Summary Judgment. Pursuant to Local Rule 56.4(b), Plaintiffs state that each of the matters required by Local Rule 56.4(a) will be set forth in Plaintiffs’ Brief in Opposition to Defendants’ Motion for Partial Summary Judgment, filed contemporaneously herewith and fully incorporated herein by reference (the “Brief”).

For the reasons set forth in the Brief, Plaintiffs respectfully request that the Court deny Defendants’ Motion for Partial Summary Judgment as requested therein.

Date: February 20, 2024

Respectfully submitted,

/s/ Grant K. Schmidt

Grant K. Schmidt

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*Moreno*

**CERTIFICATE OF SERVICE**

I, Grant K. Schmidt, do hereby certify that as an attorney of record for the Plaintiffs herein, that I have on this 20th day of February 2024, duly served the above and foregoing by electronic filing upon the following:

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